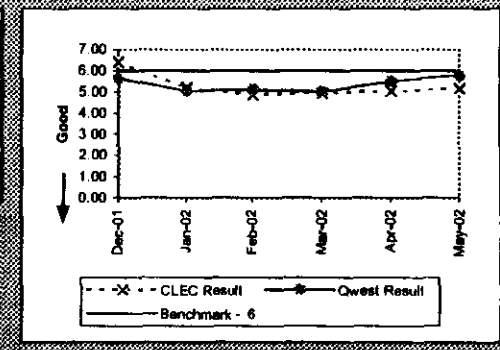
Checklist #4 - Unbundled Loop - Analog Installation

Installation Interval (Average Days) (OP-4E) (Benchmark)– Interval Zone Two

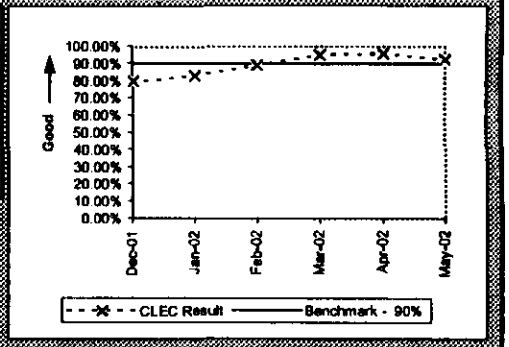
Date	CLEC Num	CLEC Denom	CLEC Result	PID Exc	Data Exc	Qwest Num	Qwest Denom	Qwest Result	Qwest Std Dev	Mod Z Scr	Parity Scr	Diff Signif?
Dec-01	6983	1087	6.42	1345	7	44198	7834	5.64	8.39	2.88	0.75	Yes
Jan-02	4495	863	5.21	1386	4	42330	8379	5.05	7.51	0.58	-0.65	No
Feb-02	3292	675	4.88	1170	5	35974	7021	5.12	7.87	-0.78	-1.47	No
Mar-02	4569	923	4.95	1193	1	38177	7624	5.01	6.20	-0.27	-1.16	No
Apr-02	8003	1586	5.05	2070	1	40612	7371	5.51	7.44	-2.25	-2.37	No
May-02	4550	882	5.16	1890	1	49566	8551	5.80	8.55	-2.11	-2.28	No



Checklist #4 - Unbundled Loop - Conditioned

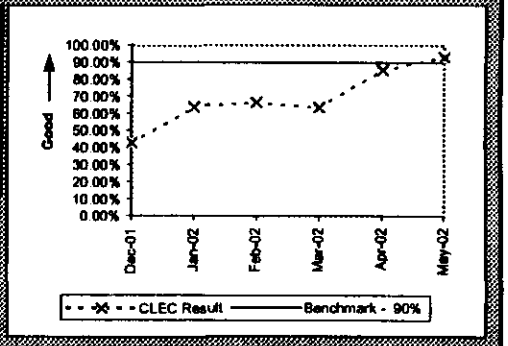
Installation Commitments Met (Percent) (OP-3D) (Benchmark)-- Interval Zone One

Date	CLEC Num	CLEC Denom	CLEC Result	PID Exc	Data Exc	CLEC Std Dev
Dec-01	162	203	79.80%	0	0	40.15%
Jan-02	292	350	83.43%	0	0	37.18%
Feb-02	195	218	89.45%	0	0	30.72%
Mar-02	180	189	95.24%	0	0	21.30%
Apr-02	189	197	95.94%	0	0	19.74%
May-02	172	186	92.47%	0	0	26.38%



Installation Commitments Met (Percent) (OP-3E) (Benchmark)-- Interval Zone Two

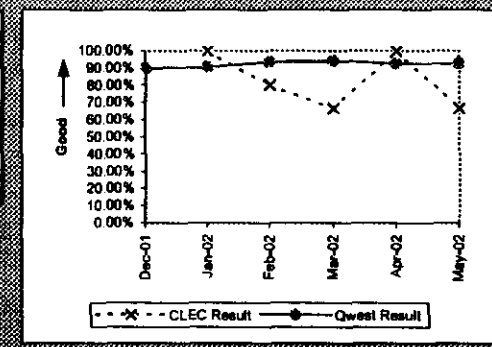
Date	CLEC Num	CLEC Denom	CLEC Result	PID Exc	Data Exc	CLEC Std Dev
Dec-01	3	7	42.86%	0	0	49.49%
Jan-02	9	14	64.29%	0	0	47.92%
Feb-02	6	9	66.67%	0	0	47.14%
Mar-02	14	22	63.64%	0	0	48.10%
Apr-02	12	14	85.71%	0	0	34.99%
May-02	14	15	93.33%	0	0	24.94%



Checklist #4 - Line Sharing Repair

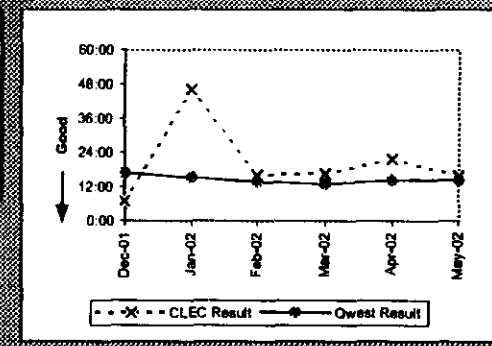
Out of Service Cleared within 24 hours (Percent) (MR-3A) (Parity)-- Dispatches Within MSAs

Date	CLEC Num	CLEC Denom	CLEC Result	PID Exc	Data Exc	Qwest Num	Qwest Denom	Qwest Result	Qwest Std De	Mod Z Scr	Parity Scr	Diff Signif?
Dec-01						16302	18146	89.84%	30.21%			
Jan-02	4	4	100.00%	15	0	16958	18704	90.67%	29.09%	-0.64	-1.39	No
Feb-02	4	5	80.00%	13	0	14607	15641	93.39%	24.85%	0.98	-0.41	No
Mar-02	2	3	66.67%	10	0	17619	18703	94.20%	23.37%	1.36	-0.17	No
Apr-02	2	2	100.00%	12	0	19542	21116	92.55%	26.26%	-0.4	-1.24	No
May-02	4	6	66.67%	27	0	23966	25912	92.49%	26.36%	1.78	0.08	Yes



Mean Time to Restore (Hours:Minutes) (MR-6A) (Parity)-- Dispatches Within MSAs

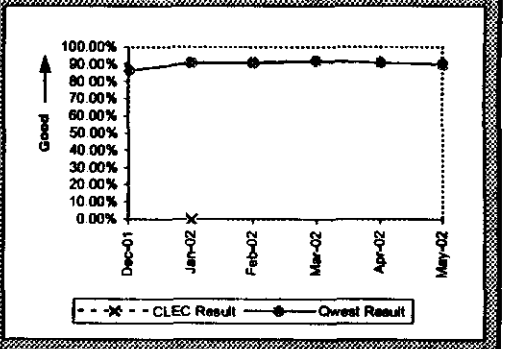
Date	CLEC Num	CLEC Denom	CLEC Result	PID Exc	Data Exc	Qwest Num	Qwest Denom	Qwest Result	Qwest Std De	Mod Z Scr	Parity Scr	Diff Signif?
Dec-01	35:36	5	7:07	9	0	418479:24	24758	16:54	22:02	-0.99	-1.6	No
Jan-02	690:13	15	46:01	15	0	388916:18	25371	15:20	15:11	2.75	0.67	Yes
Feb-02	307:21	19	16:11	13	0	293874:32	21217	13:51	12:40	0.88	-0.47	No
Mar-02	216:51	13	16:41	10	0	324036:55	24726	13:06	12:39	1.14	-0.31	No
Apr-02	284:40	13	21:54	12	0	404216:27	28167	14:21	14:05	1.76	0.07	Yes
May-02	353:24	22	16:04	27	0	501235:41	34147	14:41	13:02	0.58	-0.65	No



Checklist #4 - Line Sharing Repair

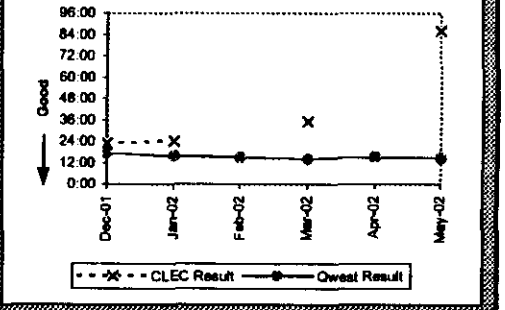
Out of Service Cleared within 24 hours (Percent) (MR-3B) (Parity)– Dispatches Outside MSAs

Date	CLEC Num	CLEC Denom	CLEC Result	PID Exc	Data Exc	Qwest Num	Qwest Denom	Qwest Result	Qwest Std Dv	Mod Z Scr	Parity Scr	Diff Signif?
Dec-01						5443	6296	86.45%	34.22%			
Jan-02	0	1	0.00%	2	0	4833	5319	90.86%	28.81%	1.69	0.03	Yes
Feb-02						4477	4929	90.83%	28.86%			
Mar-02						5441	5922	91.88%	27.32%			
Apr-02						6781	7457	90.93%	28.71%			
May-02						7485	8315	89.77%	30.31%			



Mean Time to Restore (Hours:Minutes) (MR-6B) (Parity)– Dispatches Outside MSAs

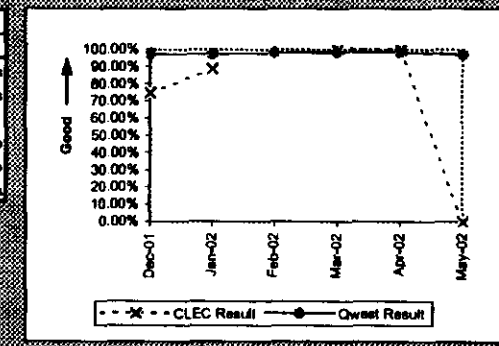
Date	CLEC Num	CLEC Denom	CLEC Result	PID Exc	Data Exc	Qwest Num	Qwest Denom	Qwest Result	Qwest Std Dv	Mod Z Scr	Parity Scr	Diff Signif?
Dec-01	46:16	2	23:08	2	0	158923:04	9011	17:38	17:25	0.61	-0.51	No
Jan-02	24:43	1	24:43	2	0	124119:45	7743	16:02	16:17	1.12	-0.32	No
Feb-02						107238:13	7056	15:12	16:39			
Mar-02	70:40	2	35:20	0	0	118043:28	8297	14:14	19:54	1.83	0.11	Yes
Apr-02						159639:36	10336	15:27	16:54			
May-02	172:39	2	86:20	0	0	171698:40	11390	15:04	14:18	3.09	0.88	Yes



Checklist #4 - Line Sharing Repair

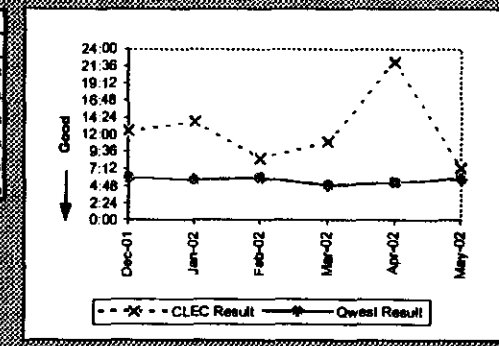
Out of Service Cleared within 24 hours (Percent) (MR-3C) (Parity)-- No Dispatches

Date	CLEC Num	CLEC Denom	CLEC Result	PID Exc	Data Exc	Qwest Num	Qwest Denom	Qwest Result	Qwest Std Dv	Mod Z Scr	Parity Scr	Diff Signif?
Dec-01	3	4	75.00%	8	0	7615	7791	97.74%	14.86%	1.7	0.03	Yes
Jan-02	16	18	88.89%	17	0	8779	9015	97.38%	15.97%	1.7	0.04	Yes
Feb-02						7749	7899	98.10%	13.65%			
Mar-02	1	1	100.00%	11	0	9773	9916	98.56%	11.92%	-0.12	-1.07	No
Apr-02	2	2	100.00%	4	0	7002	7118	98.37%	12.66%	-0.18	-1.11	No
May-02	0	2	0.00%	8	0	7961	8193	97.17%	16.59%	3.37	1.05	Yes



Mean Time to Restore (Hours:Minutes) (MR-6C) (Parity)-- No Dispatches

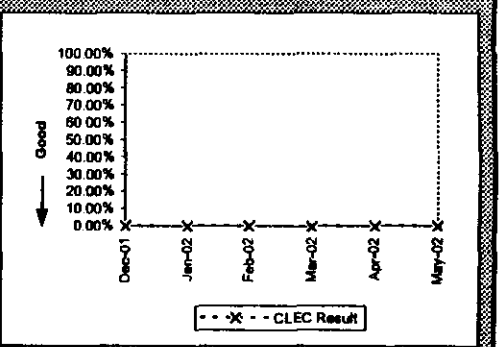
Date	CLEC Num	CLEC Denom	CLEC Result	PID Exc	Data Exc	Qwest Num	Qwest Denom	Qwest Result	Qwest Std Dv	Mod Z Scr	Parity Scr	Diff Signif?
Dec-01	366:04	29	12:37	8	0	91770:26	15314	6:00	10:43	2.75	0.67	Yes
Jan-02	719:19	52	13:50	17	0	101122:49	17921	5:39	9:12	3.72	1.26	Yes
Feb-02	330:54	38	8:42	17	0	98684:57	16618	5:57	8:21	1.85	0.13	Yes
Mar-02	429:44	39	11:01	11	0	92880:24	18964	4:54	8:04	3.72	1.26	Yes
Apr-02	377:27	17	22:12	4	0	83497:17	15664	5:20	7:52	3.72	1.26	Yes
May-02	243:59	33	7:24	8	0	96578:42	16473	5:52	8:40	1.08	-0.34	No



Checklist #4 - Dark Fiber - Loop Repair

Trouble Rate (Percent) (MR-8) (Diagnostic) – Interval Zone One and Two

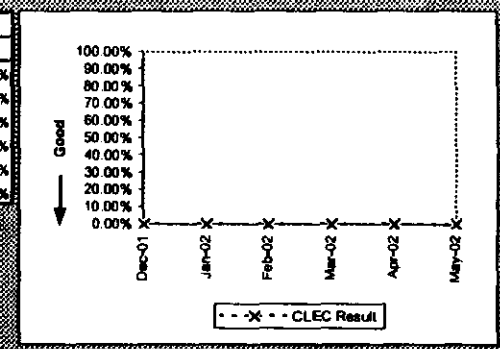
Date	CLEC Num	CLEC Denom	CLEC Result	PID Exc	Data Exc	Std Dev
Dec-01	0	6	0.00%	0	0	0.00%
Jan-02	0	6	0.00%	0	0	0.00%
Feb-02	0	6	0.00%	0	0	0.00%
Mar-02	0	7	0.00%	0	0	0.00%
Apr-02	0	7	0.00%	0	0	0.00%
May-02	0	7	0.00%	0	0	0.00%



Checklist #5 - Dark Fiber - IOF Repair

Trouble Rate (Percent) (MR-8) (Diagnostic)– Interval Zone One and Two

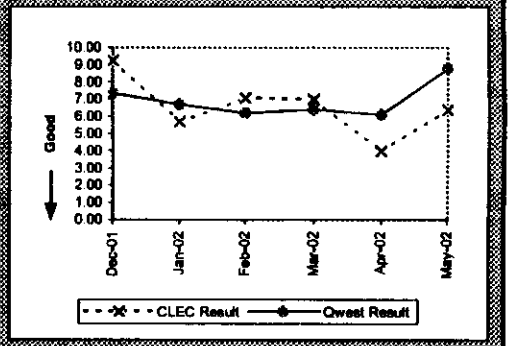
Date	CLEC Num	CLEC Denom	CLEC Result	PID Exc	Data Exc	Std Dev
Dec-01	0	11	0.00%	0	0	0.00%
Jan-02	0	11	0.00%	0	0	0.00%
Feb-02	0	11	0.00%	0	0	0.00%
Mar-02	0	5	0.00%	0	0	0.00%
Apr-02	0	5	0.00%	0	0	0.00%
May-02	0	5	0.00%	0	0	0.00%



Checklist #14 - Resale - Centrex 21 Installation

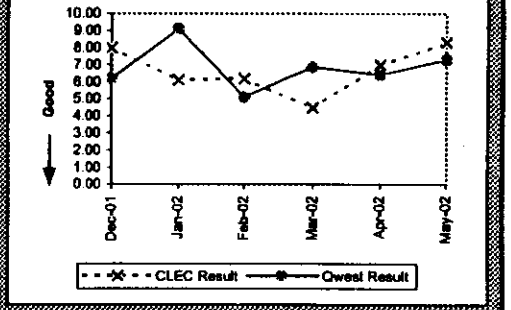
Installation Interval (Average Days) (OP-4A) (Parity)-- Dispatches Within MSAs

Date	CLEC Num	CLEC Denom	CLEC Result	PID Exc	Data Exc	Qwest Num	Qwest Denom	Qwest Result	Qwest Std De	Mod Z Scr	Parity Scr	Diff Signif?
Dec-01	37	4	9.25	0	0	3164	430	7.36	7.33	0.64	-0.61	No
Jan-02	40	7	5.71	0	0	3102	463	6.70	8.92	-0.29	-1.18	No
Feb-02	78	11	7.09	0	0	2692	434	6.20	7.01	0.55	-0.67	No
Mar-02	35	5	7.00	0	0	3035	474	6.40	7.07	0.38	-0.77	No
Apr-02	8	2	4.00	0	0	2847	465	6.12	7.22	-0.41	-1.25	No
May-02	32	5	6.40	0	0	3712	423	8.78	12.57	-0.42	-1.26	No



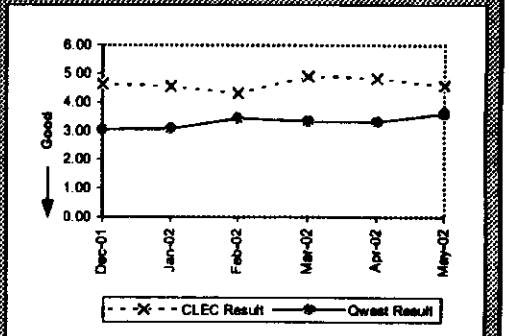
Installation Interval (Average Days) (OP-4B) (Parity)-- Dispatches Outside MSAs

Date	CLEC Num	CLEC Denom	CLEC Result	PID Exc	Data Exc	Qwest Num	Qwest Denom	Qwest Result	Qwest Std De	Mod Z Scr	Parity Scr	Diff Signif?
Dec-01	16	2	8.00	0	0	502	81	6.20	7.06	0.8	-0.51	No
Jan-02	55	9	6.11	0	0	1042	114	9.14	15.43	-0.57	-1.34	No
Feb-02	31	5	6.20	0	0	464	91	5.10	5.35	0.64	-0.61	No
Mar-02	9	2	4.50	0	0	713	104	6.86	15.18	-0.22	-1.13	No
Apr-02	28	4	7.00	0	0	641	100	6.41	7.13	0.4	-0.76	No
May-02	50	6	8.33	0	0	745	102	7.30	9.38	0.57	-0.66	No



Installation Interval (Average Days) (OP-4C) (Parity)-- No Dispatches

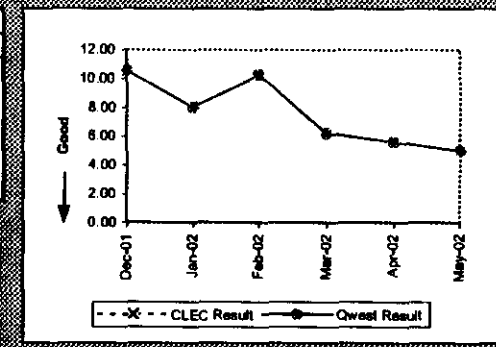
Date	CLEC Num	CLEC Denom	CLEC Result	PID Exc	Data Exc	Qwest Num	Qwest Denom	Qwest Result	Qwest Std De	Mod Z Scr	Parity Scr	Diff Signif?
Dec-01	79	17	4.65	0	0	844	277	3.05	1.89	2.37	0.44	Yes
Jan-02	64	14	4.57	1	0	553	179	3.09	2.56	1.42	-0.14	No
Feb-02	91	21	4.33	7	0	1115	323	3.45	1.97	1.77	0.08	Yes
Mar-02	162	33	4.91	11	0	994	298	3.34	1.46	3.72	1.26	Yes
Apr-02	92	19	4.84	6	0	776	233	3.33	1.39	3.72	1.26	Yes
May-02	174	38	4.58	10	0	843	178	3.61	3.91	1.11	-0.32	No



Checklist #14 - Resale - Basic ISDN Installation

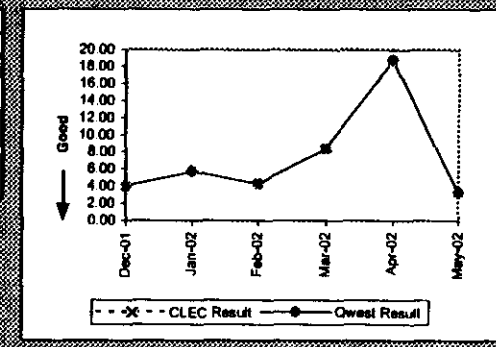
Installation Interval (Average Days) (OP-4A) (Parity)-- Dispatches Within MSAs

Date	CLEC Num	CLEC Denom	CLEC Result	PID Exc	Data Exc	Qwest Num	Qwest Denom	Qwest Result	Qwest Std De	Mod Z Scr	Parity Scr	Diff Signif?
Dec-01						349	33	10.58	19.81			
Jan-02						297	37	8.03	9.66			
Feb-02						329	32	10.28	14.96			
Mar-02						180	29	6.21	4.79			
Apr-02						235	42	5.60	5.77			
May-02						160	32	5.00	7.31			



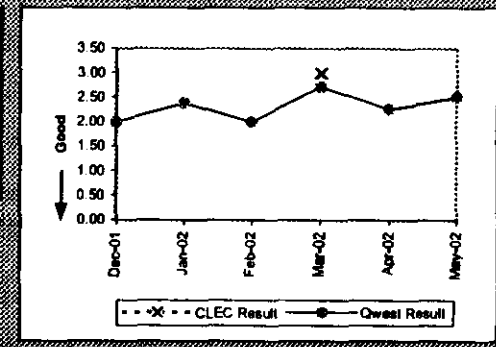
Installation Interval (Average Days) (OP-4B) (Parity)-- Dispatches Outside MSAs

Date	CLEC Num	CLEC Denom	CLEC Result	PID Exc	Data Exc	Qwest Num	Qwest Denom	Qwest Result	Qwest Std De	Mod Z Scr	Parity Scr	Diff Signif?
Dec-01						24	6	4.00	2.45			
Jan-02						46	8	5.75	3.01			
Feb-02						13	3	4.33	0.58			
Mar-02						42	5	8.40	8.79			
Apr-02						75	4	18.75	15.62			
May-02						13	4	3.25	2.36			



Installation Interval (Average Days) (OP-4C) (Parity) – No Dispatches

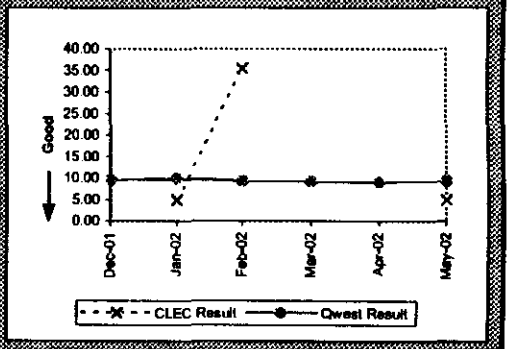
Date	CLEC Num	CLEC Denom	CLEC Result	PID Exc	Data Exc	Qwest Num	Qwest Denom	Qwest Result	Qwest Std De	Mod Z Scr	Parity Scr	Diff Signif?
Dec-01						6	3	2.00	0.00			
Jan-02						19	8	2.38	1.19			
Feb-02						10	5	2.00	1.22			
Mar-02	3	1	3.00	0	0	38	14	2.71	1.14	-0.8	-1.49	No
Apr-02						18	8	2.25	0.71			
May-02						15	6	2.50	0.84			



Checklist #14 - Resale - Basic ISDN Installation

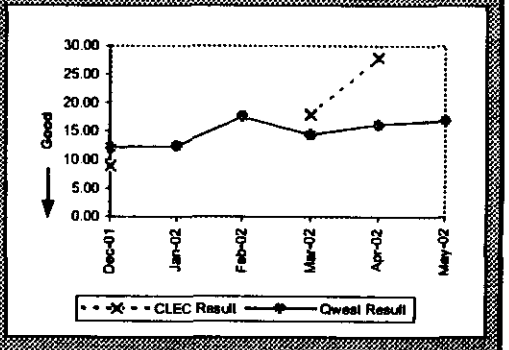
Installation Interval (Average Days) (OP-4D) (Parity)-- Interval Zone One

Date	CLEC Num	CLEC Denom	CLEC Result	PID Exc	Data Exc	Qwest Num	Qwest Denom	Qwest Result	Qwest Std Dv	Mod Z Scr	Parity Scr	Diff Signif?
Dec-01						2195	229	9.59	7.17			
Jan-02	5	1	5.00	0	0	3020	304	9.93	7.93	-0.62	-1.38	No
Feb-02	71	2	35.50	0	0	3119	335	9.31	12.03	2.2	0.34	Yes
Mar-02						3045	330	9.23	7.19			
Apr-02						2862	316	9.06	7.25			
May-02	5	1	5.00	0	0	2242	239	9.38	8.36	-0.52	-1.32	No



Installation Interval (Average Days) (OP-4E) (Parity)-- Interval Zone Two

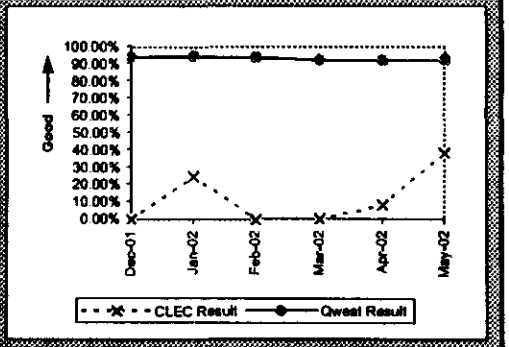
Date	CLEC Num	CLEC Denom	CLEC Result	PID Exc	Data Exc	Qwest Num	Qwest Denom	Qwest Result	Qwest Std Dv	Mod Z Scr	Parity Scr	Diff Signif?
Dec-01	9	1	9.00	0	0	1140	93	12.26	11.13	-0.29	-1.16	No
Jan-02						1646	132	12.47	9.76			
Feb-02						3358	191	17.58	11.62			
Mar-02	18	1	18.00	0	0	2302	159	14.48	12.79	0.84	-0.49	No
Apr-02	56	2	28.00	0	0	2629	162	16.23	18.88	1.96	0.19	Yes
May-02						4374	258	16.95	11.27			



Checklist #14 - Resale - DS1 Installation

New Service Installation Quality (Percent) (OP-5) (Parity)– Interval Zone One and Two

Date	CLEC Num	CLEC Denom	CLEC Result	PID Exc	Data Exc	Qwest Num	Qwest Denom	Qwest Result	Qwest Std Dv	Mod Z Scr	Parity Scr	Diff Signif?
Dec-01	0	2	0.00%	0	0	2012	2150	93.58%	24.51%	2.89	0.76	Yes
Jan-02	1	4	25.00%	0	0	1992	2115	94.18%	23.40%	3.39	1.06	Yes
Feb-02	0	4	0.00%	0	0	1973	2103	93.82%	24.06%	4.36	1.65	Yes
Mar-02	0	2	0.00%	0	0	1831	1985	92.24%	26.75%	2.77	0.68	Yes
Apr-02	1	12	8.33%	0	0	1950	2120	91.98%	27.16%	6.63	3.15	Yes
May-02	5	13	38.46%	0	0	2119	2288	92.61%	26.15%	4.95	2.01	Yes



April - MR6 A, B and C
Before and After View
Line Sharing

MR6A April 2002											
State	Before MR6A	Before Ticket			Include Future Tickets	After MR6A	After Ticket			Exclude Future Tickets	Percent Drop
AZ	1497840	18	83213.33333	1386.888889	23.11	865800	15	57720	962	16.03	
CO	1024800	13	78830.76923	1313.846154	21.90	771240	11	70112.72727	1168.545455	19.48	
MN	64980	1	64980	1083	18.05	64980	1	64980	1083	18.05	
MT	19140	1	19140	319	5.32	19140	1	19140	319	5.32	
OR	111180	2	55590	926.5	15.44	111180	2	55590	926.5	15.44	
UT	1847700	7	263957.1429	4399.285714	73.32	1590540	6	265090	4418.166667	73.64	
WA	883740	8	110467.5	1841.125	30.69	563400	6	93900	1565	26.08	
REG	5449380	50	108987.6	1816.46	30.27	3986280	42	94911.42857	1581.857143	26.36	12.92%
MR6B April 2002											
State	Before MR6B	Before Ticket			Include Future Tickets	After MR6B	After Ticket			Exclude Future Tickets	Percent Drop
AZ	10560	1	10560	176	2.93	10560	1	10560	176	2.93	
MN	147420	2	73710	1228.5	20.48	147420	2	73710	1228.5	20.48	
NM	263940	1	263940	4399	73.32						
OR	22620	1	22620	377	6.28	22620	1	22620	377	6.28	
REG	444540	5	88908	1481.8	24.70	180600	4	45150	752.5	12.54	49.22%
MR6C April 2002											
State	Before MR6C	Before Ticket			Include Future Tickets	After MR6C	After Ticket			Exclude Future Tickets	Percent Drop
AZ	105360	12	8780	146.3333333	2.44	90180	11	8198.181818	136.6363636	2.28	
CO	1358820	17	79930.58824	1332.176471	22.20	969720	15	64648	1077.466667	17.96	
MN	180000	10	18000	300	5.00	180000	10	18000	300	5.00	
NM	196140	2	98070	1634.5	27.24	196140	2	98070	1634.5	27.24	
OR	8940	1	8940	149	2.48	8940	1	8940	149	2.48	
UT	321720	11	29247.27273	487.4545455	8.12	321720	11	29247.27273	487.4545455	8.12	
WA	60360	8	7545	125.75	2.10	60360	8	7545	125.75	2.10	
REG	2231340	61	36579.34426	609.6557377	10.16	1827060	58	31501.03448	525.0172414	8.75	13.88%

Question

Explain the disparity in trouble report rates for business versus residential UNE-P Centrex in Iowa.

Answer

Ongoing investigation points to a possible unanticipated (during ROC/TAG discussions) structural anomaly in the PID associated with disaggregation at the retail analogue level. The comparison of wholesale UNE-P CTX to retail CTX is not appropriate in light of differences in application of the service by Qwest and CLECs. In Iowa, UNE-P CTX is used 38% of the time to serve residential premises and 62% of the time to serve business customers. Qwest retail CTX is exclusively a business product terminating at business premises. Trouble rates in Iowa are higher for residential premises (1.3%) than for business premises (.6%). This is borne out by the fact that 61% of the trouble report volume for UNE-P CTX is generated by 38% UNE-P CTX base that terminates at a residential premises. The increased residential repair frequency for UNE-P CTX is being compared to lower business repair rates causing the reported disparity. Further, there appear to be differences between the application of UNE-P CTX for business premises by CLECs and Qwest retail CTX making this comparison unfair as well. For example, Qwest's retail Centrex product is based on 100 pair terminal block increments and CLECs often use portions of a 100 pair terminal block. This makes the terminations in the terminal block susceptible to repair troubles due to frequent technician access. Because of differences in application, the way MR-8 is currently measured for UNE-P CTX appears to be suggesting a false disparity. At this time, Qwest plans to utilize long-term PID administration to seek further disaggregation of UNE-P CTX retail analogues into the appropriate residential and business comparatives.

CURRENT RESULTS						
	Retail CTX			Wholesale - UNE-P-CTX		
	Num	Den	MR8 %	Num	Den	MR8 %
January	43	12628	0.3%	741	107063	0.7%
February	35	12531	0.3%	731	103747	0.7%
March	33	12522	0.3%	718	103385	0.7%
April	46	12516	0.4%	989	101691	1.0%
May	45	12458	0.4%	929	98506	0.9%
Total	202	62655	0.3%	4108	514392	0.8%

BUS ONLY RESULTS						
	Retail BUS			Wholesale UNE-P-CTX (BUS)		
	Num	Den	MR8 %	Num	Den	MR8 %
January	845	162071	0.5%	289	66379	0.4%
February	786	160565	0.5%	285	64323	0.4%
March	886	160407	0.6%	280	64099	0.4%
April	1040	159746	0.7%	386	63048	0.6%
May	1139	159460	0.7%	362	61074	0.6%
Total	4696	802249	0.6%	1602	318923	0.5%

RES ONLY RESULTS						
	Retail RES			Wholesale UNE-P-CTX (RES)		
	Num	Den	MR8 %	Num	Den	MR8 %
January	7325	706379	1.0%	452	40684	1.1%
February	7605	707802	1.1%	446	39424	1.1%
March	8189	708596	1.2%	438	39286	1.1%
April	10840	705141	1.5%	603	38643	1.6%
May	11370	702360	1.6%	567	37432	1.5%
Total	45329	3530278	1.3%	2506	195469	1.3%

Question

Provide supporting data and detailed explanation for the assertion in para. 60 of the Simpson/Stewart declaration regarding the repair repeat report rate for UNE-P POTS in Colorado.

Answer

Qwest notes that repair of UNE-P POTS issues are found in paragraph 59 of the referenced declaration, not paragraph 60. (Paragraph 60 addresses installation of UNE-P Centrex.)

The below tables reflect CLEC results were only at parity in the month of March when "No Trouble Found" was included in both the denominator and the numerator. This is the same as performance data reported under the PID MR-7C. The second table reflects the results with the "No Trouble Found" excluded from the denominator and the numerator. This is the equivalent of the tracking PID MR-7*. The CLEC results reflect parity was achieved in three out of the four months with the exception of January when the parity score was 0.19.

Qwest uses a statistical test, namely the modified "z-test", for evaluating the differences between two means or two percentages to determine whether a parity condition exists between the results for Qwest and the CLECs. The modified z-tests shall be applicable if the number of data points are greater than 100 for a given measurement. Below 100, an exact proportions test is used. In either case, a parity score is computed. A negative parity score (cells shaded green in the table) reflects the measurement is within parity.

	UNE-P POTS With "No Trouble Found" (NTF) included in the denominator and numerator								
	MR-7C				MR-7C				
Month	CLEC Numerator	CLEC Denominator	CLEC Result	CLEC Std Dev	Qwest Numerator	Qwest Denominator	Qwest Result	Mod Z Score	Parity Score
Jan	25	132	18.94%	39.18%	1425	11228	12.69%	2.04	0.24
Feb	30	150	20.00%	40.00%	1275	9978	12.78%	2.48	0.51
Mar	18	110	16.36%	36.99%	1778	12175	14.60%	0.54	
Apr	34	170	20.00%	40.00%	1184	8652	13.68%	2.26	0.37
	UNE-P POTS With "No Trouble Found" (NTF) excluded in the denominator and numerator								
	MR-7C*				MR-7C*				
Month	CLEC Numerator	CLEC Denominator	CLEC Result	CLEC Std Dev	Qwest Numerator	Qwest Denominator	Qwest Result	Mod Z Score	Parity Score
Jan	20	97	20.62%	40.46%	687	5122	13.41%	1.96	0.19
Feb	19	95	20.00%	40.00%	597	4271	13.98%	1.61	
Mar	12	68	17.65%	38.12%	1051	6417	16.38%	0.31	
Apr	18	110	16.36%	36.99%	583	3766	15.48%	0.26	

Question

Clarify para. 72 of the Simpson Declaration and explain why Qwest is at parity with retail.

Answer

The results of this measure showing that Qwest did not meet the parity standard for the first three months of 2002 was caused primarily by the use of shorter-than-standard intervals on some Qwest retail non-dispatch installation orders. This issue was addressed with the system change implemented April 12, 2002. However, the improvements caused by this change were offset by a combination of CLEC ordering practices and incorrect standard vs. longer than standard interval designations in Qwest's April results.

One CLEC was migrating a number of customers to the UNE-P product line. Its business practice was to start billing on either the 1st or the 15th of the month. [19] It did this by using order due dates of the last day of the month and the 14th of the month. Because 3/31 and 4/14 both fell on Sundays, the Qwest system accepted the orders, recognized Sunday as an invalid due date, appropriately moved the due dates to 4/1 and 4/15, respectively, and coded the order as a Qwest-assigned standard due date. This caused these orders to be included in the OP-4 results. In many cases these orders had customer-requested longer-than-standard intervals since they were nearly always using the 3/31 and 4/14 due dates for their conversions. Because the CLEC was doing a conversion of its embedded base, it had a larger-than-normal volume of work being processed and thus had a significant impact on the results. The following table displays the impact of this single CLEC (referred to as CLEC A) on the April OP-4C results.

[19] A second CLEC has shared with Qwest that it uses the same business practice of starting billing on either the 1st or the 15th. However, that second CLEC did not submit any LSRs that were included in these results from January to May.

	April 2002 OP-4C Official Results	Revised April 2002 OP-4C Results, Excluding CLEC A
OP-4C Numerator - CLEC installation days	956	77
OP-4C Denominator - CLEC service orders	170	27
OP-4C Average Installation Interval - CLEC	5.62 days	2.85 days
OP-4C Average Installation Interval - Retail	3.34 days	3.34 days

Another view of the impact is portrayed in the following table that displays this CLEC's order volume as a percent of the total non-dispatched order volume for UNE-P in January through May.

Month	UNE-P OP-4C Orders for CLEC A	Total UNE-P OP-4C Orders for All CLECS	CLEC A's % of Total UNE-P OP-4C Orders
January 2002	0	32	0%
February 2002	122	140	87%
March 2002	166	199	93%
April 2002	160	170	94%
May 2002	2	20	10%

Question

Describe how UNE-P Star performance has and is being measured.

Answer

Summary

UNE-Star (an informal characterization of various types of UNE-P services provided to CLECs) is measured under the Qwest Pre-order/Order, Ordering/Provisioning, Maintenance/Repair, and Billing measurements that typically capture data by product categories, as explained in the detail section below. The following are substantiated by Summaries of Notes, TAG Meeting Minutes, and PID changes, also detailed later and included as attachments with this response:

- Pre-October 2001: Prior to the first publishing of October 2001 data, UNE-Star services were measured under the product categories of their resale counterparts (business, Centrex, or Centrex 21).
- October 2001 to March 2002: In the first reporting of Oct 01 data, UNE-Star began to be reported under UNE-P (POTS) and UNE-P (Centrex) product categories, and results also were re-run back to Jan 01.
  - Thus, this and subsequent reports display UNE-Star results under these UNE-P categories from Jan 01 forward.
  - Results for UNE-P (Centrex 21) were reported under UNE-P (POTS) until the first reporting of Mar 02 results.
- March to May 2002: When Mar 02 results were first reported, UNE-P (Centrex 21) was determined *not* to be a POTS service and was removed from UNE-P (POTS) results. Then, after a new PID category for UNE-P (Centrex 21) was approved by the TAG in May 02, results began to be displayed under that category, beginning in the first reporting of May 02 results. (This included a re-run of results back to Dec 01).

- PID Activity:
  - UNE-P (POTS) already had been specified in the PIDs;
  - UNE-P (Centrex) was approved by the TAG in Nov 01 (appearing in PID version 4.1 and beyond); and
  - UNE-P (Centrex 21) was approved by the TAG in May 02 (appearing in PID version 5.0, which is the current version).

Details

"UNE-Star" is an informal name given to various implementations of UNE-Platform (UNE-P) combinations offered to various CLECs. As such, the title, "UNE-Star," is not found in any of Qwest's measurement definitions.[20] UNE-Star usually refers to services

[20] Moreover, Qwest's PIDs typically define product categories for capturing performance data, which may or may not match product names, but which do capture performance data according to criteria that are

offered on a UNE-P basis that include business POTS[21]-type, Centrex-type, and Centrex 21-type services.[22]

With respect to measurements of UNE-Star type services, Qwest's PIDs generally call for measuring the provisioning and repair UNE-P type services in one of three product categories, UNE-P (POTS), UNE-P (Centrex), and UNE-P (Centrex 21). UNE-Star performance results are captured in these product categories according to whether they are, respectively, POTS, Centrex, or Centrex 21 types of UNE-Star.[23]

In addition, there are Pre-Order/Order and Billing measurements that capture transactions involving UNE-P of all kinds, including UNE-Star, and report them in a category that can be identified as including them. These are PO-2 (Flow-through for "UNE-P (POTS)"[24]), PO-5 (Firm Order Confirmations for "Resale services and UNE-P"[25]), PO-8D (Jeopardy Notice Interval for "UNE-P (POTS)"), PO-9D (Timely Jeopardy Notices for "UNE-P (POTS)"), BI-1A (Time to Provide Recorded Usage Records for "UNEs and Resale"), BI-2 (Invoices Delivered within 10 Days for "UNEs and Resale"), BI-3A (Billing Accuracy for "UNEs and Resale"), and BI-4A (Billing Completeness for "UNEs and Resale").

Finally, there are measurements that capture transactions involving UNE-P orders, but that are reported in a non-product-specific manner. These include PO-3 & -4 (Rejection Notifications), PO-6 & -7 (Completion Notifications), and DB-1 and -2 (Database Updates).

With respect to *changes* in measurements of UNE-Star, since the earliest days of the ROC PID collaboratives, there have been changes only in the PO-2 (Flow-through), PO-5 (FOC Timeliness) and in the provisioning and repair measurements. Changes were as follows:

- 27 Nov 01: Qwest emailed a proposal to ROC and Arizona TAG participants to add "UNE-P (Centrex)" to PIDs "PO-5 and OP-3, -4, -5, -6, & -15."[26]

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applied to specific products to insure that all data for the product category, subject to PID definitions, are captured.

[21] "Plain Old Telephone Service," i.e., non-complex, non-designed, basic local exchange service.

[22] Centrex services involve dedicated common blocks and network access registers (NARs), whereas Centrex 21 services involve shared common blocks and NARs.

[23] The provisioning measurements containing these product categories are OP-3 (Commitments Met), OP-4 (Installation Intervals), OP-5 (New Service Installation Quality), OP-6 (Delayed Days), and OP-15 (Pending Delayed Days). The corresponding repair measurements are MR-3 (Out of Service Cleared < 24 hours), MR-4 (All Troubles Cleared < 48 hours), MR-6 (Mean Time to Restore), MR-7 (Repair Repeat Reports), MR-8 (Trouble Rate), and MR-9 (Repair Appointments Met) (the latter of which, MR-9, covers only "UNE-P (POTS)," consistent with its general focus on non-designed services).

[24] PO-2A-1, -2A-2, -2B-1, and -2B-2, covering flow through for all LSRs (PO-2A) and flow through for eligible LSRs (PO-2B).

[25] PO-5, subpart "(a)" of each sub-measurement of PO-5A, -5B, -5C, and -5D.

[26] Attachment A, email from Michael Williams, dated 27 Nov 01, including relevant PID attachments.

- This was presented in the context that UNE-P (POTS), which was already a PID category, would be used to capture UNE-P (Centrex 21). (Later, as explained below, this decision was modified by the TAGs to report UNE-P (Centrex 21) in its own, separate category.)
- As a result, at this point in 2001 the PID was defined to capture UNE-Star (POTS and Centrex 21 type) in the existing UNE-P (POTS) product category and to capture UNE-Star (Centrex type) in the new UNE-P (Centrex) category.

- 29 Nov 01: The ROC TAG approved the PID changes involving UNE-P (Centrex)[27] for subsequent versions of the ROC PID (versions 4.1 and beyond).[28]
- 05 Dec 01: Qwest published the "Summary of Notes"[29] for the performance results for Nov 00-Oct 01 data, which reported that, beginning with that report, UNE-P (POTS) results include "UNE-P (Business) and UNE-P (Centrex 21) that have been recently offered separately from Resale." The Notes go on to explain that, "Initial volumes of these two UNE-P (POTS) products were reported under Resale Business and Centrex, respectively."[30]
  - Results were re-run back to Jan 01, so that on this report and subsequent reports, these UNE-P items are reported in the two specified UNE-P categories, as applicable, from Jan 01 forward.
  - On Qwest's results reports, beginning with the first reporting of Oct 01 results, UNE-Star services were reported under UNE-P (POTS), if they were POTS or Centrex 21-type services; or, under UNE-P (Centrex), if they were Centrex-type services. Previous to this, UNE-Star was reported, as explained in the Summary of Notes, under Resale Business and Resale Centrex (and Resale Centrex 21).
- 27 Mar 02: Qwest distributed to the TAG the repair PIDs containing the redlined changes corresponding to the changes that added UNE-P (Centrex) to the provisioning PIDs, which inadvertently were not distributed with the provisioning PIDs that were approved in the 29 Nov 02 TAG.[31]
- 11 Apr 02: The ROC TAG approved adding "UNE-P (Centrex)" to repair PIDs.[32]
- 09 May 02: Qwest published the "Summary of Notes" for Apr 01-Mar 02 data, which reported: "Further review of UNE-P POTS and UNE-P Centrex 21 indicates that, contrary to initial presumptions, UNE-P Centrex 21 has characteristics different than POTS that make it inappropriate to include with UNE-P POTS."[33]

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[27] Subject to some questions raised by McLeod about PO-5 (only) to insure that its FOC intervals, where agreed to be at 24 hours, would remain so. Subsequent explanations to the TAG satisfied McLeod.
[28] Attachment B, *Minutes* of 29 Nov 01TAG meeting, Item 5.
[29] On Qwest's external website that contains the latest performance results and related notes summaries, www.qwest.com/wholesale/results/roc.html, selecting "View Regional Report Summary of Notes . . . ." Qwest notifies all the ROC and Arizona TAG participants via email on the day the results and notes are updated on the website that they have been posted.
[30] Attachment C, *Summary of Notes*, dated 05 Dec 01, yellow-highlighted items.
[31] Attachment D, email from Kathy Haile, dated 27 Mar 02, including relevant PID attachments.
[32] Attachment E, *Minutes* of 11 Apr 02 ROC TAG meeting-revised, Item 5.
[33] Attachment F, *Summary of Notes*, dated 09 May 02, page one, yellow-highlighted item.

- The Summary states, "To the extent past results included UNE-P Centrex 21 (expected to be relatively small volumes), the next report (for results from May 2001 through May 2002) will not include UNE-P Centrex 21."
- The Summary also mentions, under OP-3, 4, 5, 6, & 15 (on page 15), a programming detail about "UNE-STAR" that was implemented to use the "original" product code (i.e., the previous product code, prior to conversion, consisting of resale or retail business, Centrex, Centrex 21) to identify product category for UNE-P reporting purposes under the PID.
- The Summary indicates that affected results were re-run, such that the effects of these actions are shown in Dec 01 results forward on this and subsequent reports.

- 23 May 02: The ROC TAG approved Qwest's proposal to add UNE-P (Centrex 21) as a product category in the provisioning and repair measurements (the same measurements to which the UNE-P (Centrex) category was added).[34]
- 05 Jul 02: Qwest published the "Summary of Notes" for performance results for Jun 01-May 02 data, which reported, "Implemented programming to report UNE- P CTX21 as a separate product, per recently approved PID addition." Thus, while UNE-P (Centrex 21) was removed from results beginning with the two reports prior, the PID had since been updated to include the UNE-P (Centrex 21) category, and this report is the first one to report the new category with results re-run and displayed back to Dec 01.[35]

[34] Attachment G, *Minutes* of 23 May 02 ROC TAG meeting, Item 12(3).
[35] Attachment H, *Summary of Notes*, dated 05 Jul 02, page 20, OP-3, 4, 5, 6, & 15, on the row dealing with "UNE-P (Centrex 21)."

ATTACHMENT A

"Michael Williams" <mgwill1@qwest.com> on 11/27/2001 05:23:07 PM

To: roc-tag@psclist.state.mt.us, sedona@usa.capgemini.com
cc:

Subject: Qwest PID Proposals for TAG

TO TAG MEMBERS:

Attached is a copy of PIDs PO-5 and OP-3, -4, -5, -6, & -15 containing redlined revisions that Qwest proposes for TAG approval. The proposed changes consist of the following:

1. Updating the indicated PIDs to measure UNE-P (Centrex). In PO-5, this consists of showing (a) the product grouping in which this will be reported and (b) the interval category against which Centrex (and also Centrex 21) will be measured. The changes to PO-5 will be reflected in the Dec 01 report and the changes to the other PIDs are in the Nov 01 report.
2. Expanding the disaggregation of OP-4C (i.e., non-dispatched) to clarify how the retail analogue data should "line up" with wholesale data to represent a more "apples to apples" comparison. This change is explained in more detail in the attached document, "OP-4C Expanded Disaggregation."

Qwest requests that this be scheduled for consideration and approval at the next TAG meeting.

Regards,
Mike Williams
Qwest
(See attached file: PO-5,OP-3,4,6,&15 UNE-Ctx & OP-4C expanded disagg-27Nov01.doc) (See attached file: OP-4C Expanded Disagg Proposal 27Nov01.doc)

PO-5,OP-3,4,6,&15 UNE-Ctx & OP-4C expanded disagg-27Nov01.doc
OP-4C Expanded Disagg Proposal 27Nov01.doc

PO-5 – Firm Order Confirmations (FOCs) On Time – 27 Nov 01 Proposed Revision

Purpose:
Monitors the timeliness with which Qwest returns Firm Order Confirmations (FOCs) to CLECs in response to LSRs/ASRs received from CLECs, focusing on the degree to which FOCs are provided within specified intervals.

Description:
Measures the percentage of Firm Order Confirmations (FOCs) that are provided to CLECs within the intervals specified under "Standards" below for FOC notifications.

- Includes all LSRs/ASRs that are submitted through the specified interface or in the specified manner (i.e., facsimile) that receive an FOC during the reporting period, subject to exclusions specified below. (Acknowledgments sent separately from an FOC (e.g., EDI 997 transactions are not included.)
- For PO-5A, the interval measured is the period between the LSR received date/time (based on scheduled up time) and Qwest's response with a FOC notification (notification date and time).
- For PO-5B, 5C, and 5D, the interval measured is the period between the application date and time, as defined herein, and Qwest's response with a FOC notification (notification date and time).
- "Fully electronic" LSRs are those (1) that are received via IMA or EDI, (2) that involve no manual intervention, and (3) for which FOCs are provided mechanically to the CLEC. NOTE 2
- "Electronic/manual" LSRs are received electronically via IMA or EDI and involve manual processing.
- "Manual" LSRs are received manually (via facsimile) and processed manually.
- ASRs are measured only in business days.
- LSRs will be evaluated according to the FOC interval categories shown in the "Standards" section below, based on the number of lines/services requested on the LSR or, where multiple LSRs from the same CLEC are related, based on the combined number of lines/services requested on the related LSRs.

Reporting Period: One month	**Unit of Measure:** Percent

Reporting Comparisons: CLEC aggregate and individual CLEC results	**Disaggregation Reporting:** Statewide level (per multi-state system serving the state). Results for this indicator are reported as follows: • PO-5A:* FOCs provided for fully electronic LSRs received via: – PO-5A-1 IMA – PO-5A-2 EDI • PO-5B:* FOCs provided for electronic/manual LSRs received via: – PO-5B-1 IMA – PO-5B-2 EDI • PO-5C: * FOCs provided for manual LSRs received via Facsimile. • PO-5D: FOCs provided for ASRs requesting LIS Trunks. * Each of the PO-5A, PO-5B and PO-5C measurements listed above will be further disaggregated as follows: – (a) FOCs provided for Resale services and UNE-P – (b) FOCs provided for Unbundled Loops and specified Unbundled Network Elements – (c) FOCs provided for LNP

Formula:

PO-5A - [Count of LSRs for which the original FOCs "(FOC Notification Date & Time) - (LSR received date/time (based on scheduled up time))" is within 20 minutes] / (Total Number of original FOC Notifications transmitted for the service category in the reporting period).

PO-5B, 5C & 5D - [Count of LSRs/ASRs for which the original FOCs "(FOC Notification Date & Time) - (Application Date & Time)" is within the intervals specified for the service category involved] / (Total Number of original FOC Notifications transmitted for the service category in the reporting period).

Exclusions:

- LSRs/ASRs involving individual case basis (ICB) handling based on quantities of lines, as specified in the "Standards" section below, or service/request types, deemed to be projects.
- Hours on Weekends and holidays. (Except for PO-5A which only excludes hours outside the scheduled up time).
- LSRs with CLEC-requested FOC arrangements different from standard FOC arrangements.
- Records with invalid product codes.
- Records missing data essential to the calculation of the measurement per the PID.
- Duplicate LSR numbers. (Exclusion to be eliminated upon implementation of IMA capability to disallow duplicate LSR #'s.)
- Invalid start/stop dates/times.

Additional PO-5D exclusion:

- Records with invalid application or confirmation dates.